

PHOENIX MEDIA GROUP  
SUITE 200  
1407 SUMNER STREET  
ST. PAUL, MINNESOTA 55116  
(612) 699-1776

km-7884  
MM 92-14 ✓

JAN 2 10 00 AM '92

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December 27, 1991 10 30 1991

FCC MAIL BRANCH

The Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Petition for Rule Making for New FM Assignment

Dear Secretary:

Phoenix Media Group hereby respectfully requests that the Commission initiate a rule making to assign FM Channel 227C1 to Ashland, Wisconsin.

Enclosed are an original and four (4) copies of the engineering exhibit in support of this request.

It is our intention to apply for a construction permit to operate on the requested channel when it is assigned.

Sincerely yours,

  
Steven T. Moravec  
Principal

STM:glm

Attachment

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JAN 2 1992  
FIM EXAMINERS

## ENGINEERING STATEMENT

This engineering statement and the attached figure have been prepared on behalf of Phoenix Media Group, by B. Benjamin Evans of Evans Associates, Consulting Communications Engineers in Thiensville, Wisconsin. This exhibit supports a petition for rule making by Phoenix Media Group requesting modification of the Table of FM Allotments to specify FM Channel 227C1 (93.3 MHz) at Ashland, Wisconsin.

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Evans Associates has been retained by Phoenix Media Group to conduct an engineering determination concerning the feasibility of assigning an FM channel to Ashland, Wisconsin. This petition for rule making, if granted, would provide Ashland with its second FM assignment. Pursuant to this firm's employment, the attached engineering exhibit has been prepared.

Ashland is located in Ashland County in northern Wisconsin. The 1980 U.S. Census population of Ashland was 9,115 persons.

As a result of a frequency search conducted by this office, it has been determined that FM Channel 227C1 may be assigned to Ashland, Wisconsin, as a "drop-in" without affecting any existing or proposed FM assignments. It is therefore respectfully requested that Section 73.202(b) of the FCC Rules and Regulations be amended in the following manner:

<u>COMMUNITY</u>	<u>EXISTING</u>	<u>PROPOSED</u>
Ashland, WI	244C2	227C1, 244C2

It is the applicant's intention to apply for a construction permit to operate on the FM channel proposed herein, if it is assigned.

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The coordinates of the Ashland reference point are:

NOV 10 1991

N. Lat. 46°-35'-24"; W. Long. 90°-53'-00"

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The assignment of Channel 227C1 to Ashland will meet all minimum distance separation requirements under the FCC Rules if the transmitter reference point is located at least 8.5 kilometers northwest of Ashland. The coordinates which reflect this site restriction are as follows:

N. Lat. 46°-39'-30"; W. Long. 90°-56'-00"

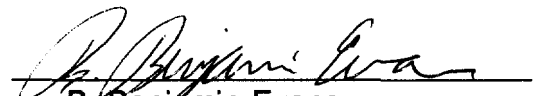
Since a full Class C1 facility places a predicted 3.16 mV/m contour at an average distance of 50 kilometers from the transmitter site, and since Ashland is about 14 square miles in size, a facility operating on the FM assignment proposed herein at the restrictive coordinates would easily meet the required city of license coverage requirement.

In view of the above, it is believed that the assignment of Channel 227C1 to Ashland, Wisconsin would be in the public interest.

The foregoing statement, and the attached figure, are true and accurate to the best of my knowledge and belief.

**Attached Figures**

Figure 1 ----- Allocation Study - Channel 227C1

  
B. Benjamin Evans

December 27, 1991

Evans Associates  
216 N. Green Bay Road  
Thiensville, WI 53092  
FM FREQUENCY ALLOCATION STUDY

Channel: 227C1 ( 93.3 MHz)

Coordinates: 46 - 39 - 30 90 - 56 - 0

Job Title: PHOENIX MEDIA GROUP - ASHLAND WI

Φ indicates 73.215 Facility

Cl.A Spacing: CURRENT

CALL STATUS	Φ CITY STATE	FCC#	CH/CL-ZN	ERP-kw	HAAT-m	DA	LATITUDE LONGITUDE	BEAR-to -from-°T	DIST-km CLEAR-km	REQ -km
WLDYFM LIC	Ladysmith WI	BLH841127KR	224A	1.70	115		45 28 5 91 5 0	185.1° 4.9°	132.8 +58.3	74.5
			>*To Channel 226A per							
WSCDFM LIC	Duluth MN	BLED871109KA	225C1	70.	185		46 47 20 92 7 4	279.6° 98.7°	91.7 +10.2	81.5
			>COMMERCIAL CHANNEL 0							
WLDYFM APP	Ladysmith WI	BMLH911007KG	226A	4.5	115		45 28 5 91 5 0	185.1° 4.9°	132.8 +0.3	132.5
			>From channel 224A pe							
VACA	Ladysmith WI 91-93		226A				45 28 5 91 5 0	185.1° 4.9°	132.8 +0.3	132.5
			>Proposed to Canada a							
WIMK LIC	Iron Mountain MI	BLH820111AE	226C1	100.	180		45 49 16 88 2 28	111.7° 293.8°	241.7 +65.2	176.5
WIZMFM LIC	La Crosse WI	BLH830527AE	227C	100.	311		43 48 23 91 22 4	186.3° 6.0°	318.8 +49.3	269.5
KZPX CP	Nisswa MN	BPH880609MJ	227C	100.	320		46 56 4 94 27 30	277.8° 95.2°	270.9 +1.4	269.5
WZRK LIC	Hancock MI	BLH3495	228A	3.00	76		47 6 5 88 35 26	73.7° 255.4°	185.3 +52.7	132.5
			>*To Channel 228C3							
VACA	Hancock MI 89-161		228C3				47 6 5 88 35 26	73.7° 255.4°	185.3 +41.7	143.5
			>Effective 5-18-90-Rs							

>> \*\*\* CHANNEL SUITABLE FOR ASSIGNMENT \*\*\*

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JUN 30 1991  
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